1 2	ORRY P. KORB, County Counsel (S.B. #114399) JOHN L. WINCHESTER, III, Deputy County Counsel (S.B. #142175) OFFICE OF THE COUNTY COUNSEL		
3	70 West Hedding Street, East Wing, Ninth Floor San Jose, California 95110-1770 Telephone: (408) 299-5900 Facsimile: (408) 292-7240	EÒËZIŠÕÖÄÄÄ EDI EFHE	
5	Attorneys for Defendants		
6	COUNTY OF SANTA CLARA and Its Santa Clara Valley Medical Center, PAUL ESTESS AND ANNA HUGHES		
7			
8	UNITED STATES DISTRICT COURT		
9	NORTHERN DISTRICT OF CALIFORNIA		
10			
11	HUIMIN SONG,	No. 12-CV05848 RMW	
12	Plaintiff,	STIPULATION AND ORDER ENLARGING	
13	v.	TIME FOR DEFENDANTS TO RESPOND TO PLAINTIFF'S FIRST AMENDED COMPLAINT AND CONTINUANCE OF CASE MANAGEMENT CONFERENCE	
14	COUNTY OF SANTA CLARA, et al.,		
15	Defendants.		
16			
17	The parties, through their respective counsel of record, hereby stipulate and agree to an order		
18	enlarging time, until July 29, 2013, for Defendants County of Santa Clara and its Santa Clara Valley		
19	Medical Center, Paul Estess and Anna Hughes to file and serve a response to the First Amended		
20	Complaint of Plaintiff Huimin Song. The First Amended Complaint was served on March 13, 2013.		
21	Although this is the third requested extension, good cause exists for this enlargement of time.		
22	Song and the County of Santa Clara are involved in litigation in the matter of <i>Huimin Song and Andy</i>		
23	Xie v. County of Santa Clara, Santa Clara Valley Medical Center, et. al., Case No. CV11-04450,		
24	pending before United States District Judge Edward J. Davila. The parties have been engaged in		
25	private mediation since January 16, 2013 with mediator Kael Briski of the Briski Mediation Group.		
26	Since the initial mediation on January 16, the parties and Mr. Briski have had countless email		
27	communications, four face to face discussions and no less than twenty phone conferences.		
28	Settlement demands, offers and terms of resolution have been exchanged. The settlement		

Case 5:12-cv-05848-RMW Document 17 Filed 06/24/13 Page 2 of 3

1	discussions have involved resolution of all issues, including the allegations giving rise to this		
2	lawsuit, between Song and the County. The parties resolved the matter on April 29, 2013.		
3	However, counsel for plaintiff was engaged in tri	al between May 6 and May 13, 20013. Plaintiffs	
4	and the mediator were provided with proposed re	lease agreements thereafter on May 16, 2013.	
5	Since that time, plaintiffs and the mediator have i	met on two occasions to discuss the terms of the	
6	release agreement. Lead counsel for plaintiffs, Charles Bonner, is now currently out of the country		
7	and expected to return at the end of June. The parties are hopeful that the release agreements will be		
8	executed and the matter resolved following Mr. Bonner's return.		
9	In view of the time and effort that will be necessary to prepare an appropriate responsive		
10	pleading and the anticipated settlement of all litigation, the parties respectfully request an order		
11	enlarging Defendants time to respond to the First Amended Complaint to July 29, 2013.		
12	Furthermore, the parties request that the Case Management Conference be continued to Friday,		
13	August 52, 2013, 10:30 a.m.		
14	I hereby attest that I have on file the holograph signature indicated by a "conformed"		
15	signature (/S/) within this e-filed document.		
16	IT IS SO STIPULATED		
17		Respectfully submitted,	
18		LAW OFFICES OF BONNER & BONNER	
19	D. 1. 1. 01.0010		
20	Dated: June 21, 2013 By	:/S/ CHARLES A. BONNER, ESQ.	
21		Attorney for Plaintiff HUIMIN SONG	
22			
23		ORRY P. KORB County Counsel	
24	Dated: June 21, 2013 By	:	
25		JOHN L. WINCHESTER, III Deputy County Counsel	
26		Attorneys for Defendant	
27		COUNTY OF SANTA CLARA and Its Santa Clara Valley Medical Center, PAUL ESTESS AND ANNA HUGHES	
28		2	

Case 5:12-cv-05848-RMW Document 17 Filed 06/24/13 Page 3 of 3

1	ORDER
2	Defendants may have to and including July 29, 2013 by which to file and serve a response to
3	Plaintiff's First Amended Complaint. The Case Management Conference is continued to August 52,
4	2013, 10:30 a.m. The Joint Case Management Statement is to be filed no later than August 45, 2013.
5	R
6	HONORABLE RONALD M. WHYTE
7	United States District Court Judge
8	
9	
10	
11	
12	
13	
14	
15	
16 17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	730215